

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

No. 3:23-md-03084-CRB

**DECLARATION OF SAMANTHA HOEFS
IN SUPPORT OF MOTION FOR AN
ORDER TO PRODUCE DOCUMENTS
PURSUANT TO 15 U.S.C. § 1681B**

This Document Relates to:

Judge: Hon. Lisa J. Cisneros

All Cases

1. I, Samantha Hoefs, declare and state as follows:
2. I am an attorney at Nigh Goldenberg Raso & Vaughn, PLLC, counsel for Plaintiffs, and admitted *pro hac vice* in *In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-MD-03084-CRB.
3. I submit this Declaration in support of Plaintiffs' Motion for an Order to Produce Documents Pursuant to 15 U.S.C. § 1681b.
4. The following bellwether plaintiffs served third party subpoenas on Accurate Background:

Case Number	Plaintiff
3:24-cv-07019	LCHB128
3:23-cv-06708	Jaylynn Dean
3:24-cv-07940	B.L.
3:24-cv-07821	A. R. 2
3:23-cv-04972	C.L.
3:24-cv-05027	WHB 1898
3:24-cv-01915	A.G.
3:24-cv-01827	T.R. for A.R. [A.R.1]
3:24-cv-09217	T. L.
3:24-cv-05028	WHB 407
3:24-cv-04889	WHB 318
3:24-cv-04900	WHB 832
3:24-cv-08783	Jane Doe QLF 001
3:24-cv-05281	K.E.
3:24-cv-06669	Jane Roe CL 68

1	3:24-cv-04803	WHB 1486
2	3:24-cv-08937	Amanda Lazio
3	3:24-cv-05230	WHB 1876
4	3:24-cv-07228	D. J.
	3:24-cv-03335	J.E.

5

6 5. Each subpoena was identical, but for the definition of “Subject Driver.” The definition of

7 “Subject Driver” listed the name, date of birth, and, if available, email, driver’s license number,

8 and city of driving for the Uber driver involved in the sexual assault or harassment of the

9 bellwether plaintiff during the trip that formed the basis of her lawsuit.

10 6. Accurate Background served Objections and Responses to the subpoenas, which were identical,

11 but for the names of plaintiffs and subject drivers.

12 7. Attached hereto as **Exhibit A** is a true and correct copy of Accurate Background’s Objections

13 and Responses to the Subpoena issued by Plaintiff B.L. With the exception of the names of

14 plaintiffs and subject drivers, **Exhibit A** is representative of Accurate Background’s Objections

15 and Responses to the remaining subpoenas.

16 8. Plaintiffs provided counsel for Accurate with a copy of their Motion and Proposed Order and

17 incorporated their redline edits.

18 9. I certify under penalty of perjury that the foregoing is true and correct. Executed on June 11,

19 2025 in Saint Paul, Minnesota.

21

22 /s/ Samantha Hoefs

23

24

25

26

27

28